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MEMO ENDORSED

June 20, 2019

BY ECF

Hon. Andrew L. Carter, Jr  
United States District Judge  
Southern District of New York  
500 Pearl St., Room 1950  
New York, NY 10007

RE. **Dobbs, et al. v. Metropolitan Transit Authority, et al.,**  
**17cv8199 (ALC)(KNF)**

Dear Judge Carter:

I represent the plaintiffs in the above referenced action and hereby submit this status report and letter motion seeking a 30-day extension of time to file an Amended Complaint and date Defendants must commence their anticipated motion to dismiss. (*See*, Docket Doc. 75). Defendants consent to the extension of time and propose amended schedule.

Defendant Advance Transit Co. Inc. has retained new counsel. (*See*, Docket Doc. 76). Consequently, in order to provide new counsel an opportunity to apprise himself of the facts of the case, as well as time to discuss settlement, I respectfully request a 30-day extension of time to file the Amended Complaint, and 30 day extension of time for Defendants to file their anticipated motion to dismiss.

Accordingly, on consent, Plaintiffs propose the following amended schedule:

File Amended Complaint by August 8, 2019

Defendants' Motions to Dismiss:

- Defendants' motion by August 29, 2019;
- Plaintiffs' Opposition: September 19, 2019;
- Defendants' Replies, if any: September 26, 2019

Thank you for your time and consideration.

Law Offices of  
James E. Bahamonde, PC

June 20, 2019

Respectfully yours,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

cc: (by ECF)

Alexis Downs, Esq.

*Attorney for Defendants MTA and New York City Transit Authority*

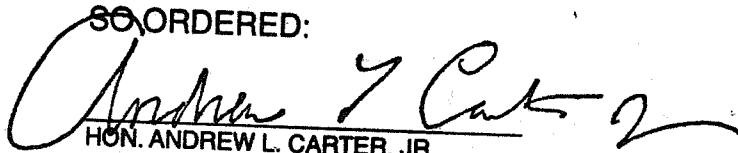
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*Attorney for Advance Transit Co. Inc.*

SO ORDERED:



HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

6-21-19